

1 PHILLIP A. TALBERT
Acting United States Attorney
2 KEVIN C. KHASIGIAN
Assistant United States Attorney
3 501 I Street, Suite 10-100
Sacramento, CA 95814
4 Telephone: (916) 554-2700
5 Attorneys for the United States

6
7
8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 APPROXIMATELY \$9,960.00 IN
U.S. CURRENCY,
15 Defendant.
16

2:20-MC-00073-TLN-CKD

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant Tunisha
18 Vance (“claimant”), by and through their respective counsel, as follows:

19 1. On or about January 10, 2020, claimant filed a claim in the administrative forfeiture
20 proceeding with the U.S. Postal Inspection Service with respect to the Approximately \$9,960.00 in U.S.
21 Currency (hereafter “defendant currency”), which was seized on October 26, 2019.

22 2. The U.S. Postal Inspection Service has sent the written notice of intent to forfeit required
23 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a
24 claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has
25 filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency
28 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture

1 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
2 That deadline was April 9, 2020.

3 4. By Stipulation and Order filed April 1, 2020, the parties stipulated to extend to July 8, 2020,
4 the time in which the United States is required to file a civil complaint for forfeiture against the defendant
5 currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

6 5. By Stipulation and Order filed July 1, 2020, the parties stipulated to extend to September 7,
7 2020, the time in which the United States is required to file a civil complaint for forfeiture against the
8 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
9 forfeiture.

10 6. By Stipulation and Order filed September 3, 2020, the parties stipulated to extend to
11 November 6, 2020, the time in which the United States is required to file a civil complaint for forfeiture
12 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject
13 to forfeiture.

14 7. By Stipulation and Order filed October 30, 2020, the parties stipulated to extend to January
15 5, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
16 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
17 forfeiture.

18 8. By Stipulation and Order filed December 31, 2020, the parties stipulated to extend to March
19 6, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
20 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
21 forfeiture.

22 9. By Stipulation and Order filed March 3, 2021, the parties stipulated to extend to April 5,
23 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
24 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
25 forfeiture.

26 10. By Stipulation and Order filed March 31, 2021, the parties stipulated to extend to May 5,
27 2021, the time in which the United States is required to file a civil complaint for forfeiture against the

28 ///

1 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
2 forfeiture.

3 11. By Stipulation and Order filed May 3, 2021, the parties stipulated to extend to August 3,
4 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
5 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
6 forfeiture.

7 12. By Stipulation and Order filed July 30, 2021, the parties stipulated to extend to October 1,
8 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
9 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
10 forfeiture.

11 13. By Stipulation and Order filed October 1, 2021, the parties stipulated to extend to November
12 1, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
13 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
14 forfeiture.

15 14. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend to
16 December 1, 2021, the time in which the United States is required to file a civil complaint for forfeiture
17 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject
18 to forfeiture.

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 15. Accordingly, the parties agree that the deadline by which the United States shall be required
2 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that
3 the defendant currency is subject to forfeiture shall be extended to December 1, 2021.

4 Dated: 11/01/21

PHILLIP A. TALBERT
Acting United States Attorney

6 By: /s/ Kevin C. Khasigian
7 KEVIN C. KHASIGIAN
Assistant United States Attorney

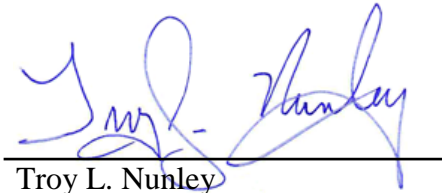
8 Dated: 11/01/21

9 /s/ Jacek W. Lentz
10 JACEK W. LENTZ
Attorney for potential claimant
Tunisha Vance

11 (Signature authorized by email)

12 **IT IS SO ORDERED.**

13 Dated: November 1, 2021

14 
15 _____
16 Troy L. Nunley
United States District Judge